

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

IN THE MATTER OF ALL FUNDS ON)
DEPOSIT IN JPAY/COOPER TRUST)
FUND ACCOUNT IN THE NAME OF)
ALLEN WILLIAMSON)

MISC. NO.:

(UNDER SEAL)

MOTION TO SEAL

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court to seal the warrant, application, affidavit, this motion to seal, and the sealing order. The purpose of the Government's request is to protect the information contained within these documents to avoid premature disclosure of the investigation, guard against fugitives, and better ensure the safety of agents and others, except that working copies should be made available to the United States Attorney's Office, the Federal Bureau of Investigation, and any other law enforcement agency designated by the United States Attorney's Office. The Court has the inherent authority to seal these documents. *See Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988); *In re Application of the United States for an Order Pursuant to 18 U.S.C § 2703(D)*, 707 F. 3d 283 (4th Cir. 2013).

Based on the foregoing, the Government requests that the tracking warrant, application, affidavit, this motion to seal, and the sealing order be filed under seal until December 4, 2019 or further order of this Court.

Respectfully submitted,

SHERRI A. LYDON
UNITED STATES ATTORNEY

By: s/ William C. Lewis
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Assistant United States Attorney

Columbia, South Carolina
December 4, 2018